

PARTIES

1. GOODWIN is a corporation organized and existing pursuant to the laws of the United Kingdom, with its registered office at Ivy House Foundry, Hanley, Stoke-on-Trent, ST1 3NR, United Kingdom. GOODWIN designs, manufactures, and supplies check valves and exports the check valves internationally, including to the United States.

2. Upon information and belief, Respondent ASI is a corporation organized and existing pursuant to the laws of the State of New Jersey with its principal place of business at 1320 West Blancke Street, Linden, New Jersey 07036.

3. Upon information and belief, ASI was licensed by the Commission for all pertinent periods subject of this Complaint as a non-vessel operating common carrier ("NVOCC") in the waterborne foreign commerce of the United States and as an ocean freight forwarder (FMC License No.004331, Org No. 014726), pursuant to the Shipping Act, and maintained during the period in question the following pertinent surety bonds pursuant to 46 C.F.R. § 515.21 (1) and (2):

a) Bond Nos. JGINVOC2796 and JGIFMC1466, for \$75,000 and \$50,000, respectively, issued by Bunkers Insurance Company, effective from March 12, 2012 to the present, and;

b) NVOCC bond nos., JGINVOCC 2232 and JGIFMC 329, for \$75,000 and \$50,000, respectively, issued by Ulico Casualty Insurance Company effective from March 12, 2010 through March 12, 2012.

4. While ASI holds out to provide air and ocean services at 5349 Zambrano Street, Commerce, CA 90040, and 9958 NW 89 Court Medley, FL 33178, these locations have not been reported to the Commission, nor have surety amounts reflected these branches in violation of the Commission's regulations.

5. Upon information and belief, Mr. Ray Tobia, was the President, and Qualifying Individual of ASI at all times pertinent to the allegations herein.

FACTUAL ALLEGATIONS

6. During the period commencing on or about August 26, 2010, continuing through on or about March 24 2015, Respondents were retained by Fielding International Freight ("Fielding"), No. 19 Moorsland Urmsten, Manchester, United Kingdom, a U.K. freight forwarder for GOODWIN, to provide ocean transportation intermediary ("OTI") services to GOODWIN for shipments originating at U.K. Points by arranging for U.S. Customs clearance and other transportation related activities, including arranging for trucking services, to effect delivery of GOODWIN's imports to the U.S. at U.S. Points (door to door shipments) for a total of 118 shipments. During this period S.H.E. Maritime Ltd., doing business as Trinity Line, 2 Town Quay Wharf/Abbey Rd, Barking IG11 7BZ, United Kingdom, an unlicensed/registered NVOCC (Org. no. 009698), and other Ocean Transportation Intermediaries registered with the Federal Maritime Commission acted as non-vessel operating common carriers for the transport of GOODWIN's goods to the United States.

7. ASI acted as an FMC licensed ocean transportation intermediary in the United States which met the requirements of 46 C.F.R. §515.3 by performing duties to effect delivery of GOODWIN's goods to U.S. consignees that were transported by Trinity Line and other registered NVOCCs. Ray Tobia acted as the Qualifying Individual for ASI at all times pertinent to this Complaint.

8. Since the sales transactions subject of this proceeding were sold on Delivered Duty Paid ("DDP") terms, they required U.S. Customs and Border Protection ("CBP") clearance as a precondition to transport to the consignees' door. Respondent's

responsibilities were to perform as GOODWIN's sub-agent, as arranged by Fielding, all duties to arrange accomplishing clearing the goods through CBP pursuant to the DDP terms, in order to effect delivery of GOODWIN's shipments to the consignee's door.

9. On or about March 11, 2015, GOODWIN received the first of ten (10) Notices of Action from CBP requesting GOODWIN to pay additional import duties based on the applicable 5% ad valorem rate due to the misclassification of its check valves. Those notices asserted that GOODWIN's merchandise for the imports in question should not have been classified under 8481.20.0080, but rather should have been classified under 8481.30.2090, at the rate of 5% of the value of the merchandise. *See* Attachment A, ten Notices of Action dated 3/3/2015 through 3/16/2015.

10. On or about March 11, 2015, was the first time that GOODWIN became aware of a genuine issue of material fact that required it to perform reasonable diligence which ultimately determined that while Respondents were aware from GOODWIN shipping documentation that the vast majority of GOODWIN's merchandise were assessed duties at 5% ad valorem, Respondents nevertheless willfully, and fraudulently paid-over to U.S. CBP 2% and in some instances 3% based on false classifications of Goodwin's merchandise. GOODWIN had been paying over to Fielding and its sub-agent ASI the correct duties for the transactions subject of this Complaint based on a history of shipping its merchandise to the United States. In some instances Respondents misclassified the merchandise as duty free but still charged GOODWIN at 5% ad valorem.

11. After receiving the ten (10) notices from CBP, GOODWIN retained U.S. Customs attorneys to assist GOODWIN with the auditing process and to prepare a Prior Disclosure per CBP regulations going back for five years as required.

12. The results of the due diligence review by GOODWIN and its Customs attorneys resulted in the following conclusions:

a) that GOODWIN paid to Fielding, and ASI collected for the correct import duty rate at 5% (without consideration of the permissible deductions for merchandise process fees ("MPF") and Harbor Maintenance Fees ("HMF")); and

b) that ASI paid over to the Customs broker, Paul Bellack Inc. ("Broker")¹, an amount reflecting either 2% or 3% of the commercial invoice value, keeping the 2% or 3% difference, and on certain duty free entries, ASI still collected 5% of the value of the merchandise; and

c) that ASI not only unlawfully kept those sums, it also subjected GOODWIN to a CBP investigation.

d) that the amount due to CBP, paid over to ASI by GOODWIN, but unlawfully retained by ASI was \$209,712.24, an amount which became due and owing to U.S. CBP.

13. The above conclusions are illustrated by one sample shipment, for a shipment made pursuant to Nippon Yusen Kaisha Line ("NYK") Master bill of lading no. NYKS5581847560, Attachment B, hereto, and further supported by similar documentation for all other transactions by which the amount to be claimed from ASI was derived:

a. **Attachment B**, NYK bill of lading dated July 17, 2014, clearly indicates that Trinity Line is the Shipper, and ASI the Notify Party; the document further identifies this shipment is related to P.O. P91282-04183-13.

¹ The Janel Group was the prior Customs Broker retained by ASI from August 2010 to early 2011.

b. **Attachment C**, GOODWIN Commercial Invoice No. 28713(A) identifies the applicable USA Tariff No. 8481 30 20 90 as applicable to Check Valves, which identifies the transaction as P.O. P91282-04183-13 with a commercial invoice value of \$488,024.00². **(Note: GOODWIN's invoice contains the correct USA Tariff no. 8481 30 20 90 which calls for duty of 5% ad valorem).**

c. **Attachment D**, U.S. CBP Entry Summary relates to NYK bill of lading no. NYKS5581847560 for the following merchandise: Industrial Valves, Valves/Pneumatic, Other, 8481.20.0080/2%. The following line items appear for duties and other charges: Entry Summary Box no. for Duty, 37---\$9760.48³. The Entry Summary is dated July 24, 2014. **(Note: this entry incorrectly indicates the USA Tariff No. 8481.20.0080, and the 2% duty rate). This is a document wherein ASI clearly assisted in preparing and filing a false classification to CBP.)**

d. **Attachment E**. Paul Bellack Invoice No. 01-J88260 **(Dated July 24, 2014)**: U.S. Customs Duties: \$10,855.51(this total includes the duty paid of \$9,760.48, plus MPF, \$485, and HMF \$610.03). Note that the duty paid amount is erroneous and explained above in footnote 2 since it is calculated at 2% vice the correct duty rate of 5%. This invoice is issued to ASI with a clear indication of the items paid, including the duty paid, \$9,760.48.

e. **Attachment F**. ASI Invoice no. 29787 was issued on July 24, 2014 to Fielding/Goodwin, the same date as the invoice received by ASI from Paul Bellack, The ASI invoice was for EST. Duty and Taxes \$24,401.20⁴

MPF: \$1773.48⁵
HMF: \$610.03
Courier: \$45.00
Total: \$26829.71

² Note that after GOODWIN's Customs' counsel reviewed the entry and made appropriate deductions for DDP transactions from the Commercial Invoice value, the value amount for computing duties was reduced to \$445,465.77, which is used for our computation of amounts claimed by GOODWIN against ASI which have now been paid to CBP.

³ The amounts of duty initially paid based on the lower percentage (2%), \$9,760.48, versus the correct amount of duties due on the revised value as indicated in footnote 1 at the correct duty rate of 5% is \$22,273.29---i.e., a difference of \$12,512.81. This latter number comprises the amount withheld by ASI by charging Fielding/GOODWIN at 5% but paying over only 2% of duties collected upon which GOODWIN's claim is based, the difference pocketed by ASI.

⁴ Note that this amount even though titled "EST Duty and Taxes" is derived by ASI by calculating 5% of the commercial invoice---i.e., \$488,024.00. The 5% was the duty rate known by GOODWIN to be the correct duty rate, but what it did not know was that ASI paid-over only 2% of that amount to CBP.

⁵ Note that MPF was invoiced by ASI at \$1,773.49 while the Paul Bellack Invoice No. 01-J88260 invoiced MPF at \$485, the maximum allowed rate for MPF. At this time GOODWIN is only claiming on the amounts shorted for duties, but reserves the right to include ASI overcharges for fees.

Note: ASI was invoiced Customs duties from Paul Bellack's Invoice No. 01-J88260, issued on the same date as the ASI invoice to GOODWIN/Fielding for \$9,760.48, and at the same time ASI was invoicing Fielding/GOODWIN \$24,401.20 for the same duties.

14. GOODWIN paid \$209,712.24, the amounts retained by ASI, through its U.S. Customs attorneys to CBP on July 30, 2015. *See* Attachment G, Prior Disclosure Perfection Letter and check.

15. As a direct consequence of the unlawful conduct engaged in by Respondents, and of the violations of the Shipping Act, and the Commission's Rules and Regulations, Complainant has incurred damages.

VIOLATIONS

16. Respondents, in performing the duties prerequisite to the delivery of GOODWIN's imports, by collecting from GOODWIN through Fielding for the correct duty rate at 5%, and by paying the U.S. Customs through the Customs broker a lower rate at 2%, 3% or zero by providing a false tariff code and unlawfully keeping the remainder of the 5% duty collected from GOODWIN, violates the Shipping Act and its implementing regulations, in particular, 46 U.S. Code § 41102 (c) in that ASI failed to establish, observe, and enforce just and reasonable regulations and practices relating to or connected with the delivering of property.

17. Respondents, by assisting in the preparation and filing of false and fraudulent documentation/information concerning an ocean transportation intermediary transaction and by knowingly imparting to GOODWIN/Fielding, the principal, shipper

and other persons, such false information relative to ocean transportation intermediary transactions violated the FMC regulations at 46 C.F.R. §515.31(e).

18. Respondents, by collecting from GOODWIN through Fielding for the correct duty rate at 5%, and by paying the U.S. Customs through the Customs broker a lower rate at 2%, 3% or zero duty by providing false tariff codes, and unlawfully keeping the remaining sums collected from GOODWIN, violated the FMC regulations at 46 C.F.R. §515.31(e) by preparing and filing of false and fraudulent documentation/information concerning an ocean transportation intermediary transaction and by knowingly imparting to GOODWIN/Fielding, the principal, shipper and other persons, such false information.

19. Respondent, Mr. Ray Tobia, further violated the requirement as the Qualifying Individual of ASI in that he acted with a lack of the necessary character to render ocean transportation intermediary services as required by 46 C.F.R. §515.11(a)(1) .

DAMAGES

20. As a direct consequence of the unlawful conduct engaged in by Respondent, Complainant has suffered injury as provided herein, and as may be further demonstrated in this proceeding, and seeks relief as provided below.

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Commission issue the following relief:

1. An Order compelling Respondents to answer the charges made herein and scheduling a hearing in Washington, D.C. during which the Commission may receive evidence in this matter;

2. An Order holding that the Respondents activities described herein were unlawful and in violation of the Shipping Act;

3. An Order compelling Respondents to jointly and severally make reparations to Complainant GOODWIN in the amount of \$209,712.24, which has now been paid to U.S Customs pursuant to its Prior Disclosure Letter, and which it believes will be at minimum an amount claimed by U.S. Customs from Goodwin, plus interest and any penalties, as may be proven during the course of this proceeding, with interest as may be lawfully permitted by law, costs, and attorneys' fees;

4. An Order revoking Respondent ASI's NVOCC and freight forwarder license and further prohibiting Respondents ASI and Mr. Ray Tobia from doing NVOCC and freight forwarding business in the U.S.; and

5. Such other and further relief as the Commission deems just and proper.

ALTERNATIVE DISPUTE RESOLUTION

The Commission's informal dispute resolution procedures have not been used prior to the filing of the Complaint. Counsel for the Complainant has not consulted with the Commission's Dispute Resolution Specialist about utilizing alternative dispute resolution (ADR) under the Commission's ADR Program.

A hearing is requested in Washington, D.C.

Respectfully submitted,

By:

Carlos Rodriguez, Esq.

Zheng Xie, Esq.

Husch Blackwell LLP

750 17th Street NW, Suite 900

Washington DC 20006

Carlos.rodriguez@huschblackwell.com

Zheng.Xie@huschblackwell.com

202-378-2365 (Telephone)

202-378-2319 (Facsimile)

Attorneys for Complainant

Dated in Washington, D.C., this 26 day of August 2015.

VERIFICATION

John W. Goodwin declares and states that he is the Director of Goodwin International Ltd., Complainant in this proceeding, and that the foregoing Verified Complaint is true to the best of his information and belief, and that the grounds of his belief as to all matters not upon his own personal knowledge is information which has otherwise been provided to Complainant.

Pursuant to 28 U.S.C. §1746 (1), I declare and state under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

Executed on August 18th, 2015

John W. Goodwin, Director

Goodwin International Ltd.

ORIGINAL

RECEIVED

2015 AUG 27 PM 1:10

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

PUBLIC VERSION

-CONFIDENTIAL MATERIALS

EXCLUDED

ORIGINAL

ATTACHMENT A

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT A Notice of Liquidation			1. DATE OF THIS NOTICE 03/03/2015
2. CARRIER CNRU	3. DATE OF IMPORTATION	4. DATE OF ENTRY 02/14/2015	5. ENTRY NO. 92300909808
6. MFR/SELLER/SHIPPER GBGOOINTTRE	7. COUNTRY GB	8. CBP BROKER AND FILE NO. PAUL BELLACK INC	
9. DESCRIPTION OF MERCHANDISE SLAC VAVLES			
10. TO ▶ ENBRIDGE ENERGY, LIMITED PARTNERSHIP 1100 Louisiana St Houston, TX 77002-5227 US		11. FROM ▶ Joan Angelilli U.S. Customs and Border Protection 5600 Pearl St Rosemont, IL 60018-5318 US	
12. THE FOLLOWING ACTION, WHICH WILL RESULT IN AN INCREASE IN DUTIES, —			
<input checked="" type="checkbox"/> IS <u>PROPOSED</u>			
▶ IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASON IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS, THE ENTRY WILL BE EITHER LIQUIDATED AS PROPOSED OR CHANGED AS PROPOSED.			
<input type="checkbox"/> HAS BEEN <u>TAKEN</u>			
▶ THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.			
TYPE OF ACTION			
A. <input type="checkbox"/> RATE ADVANCE B. <input type="checkbox"/> VALUE ADVANCE C. <input type="checkbox"/> EXCESS <input type="checkbox"/> WEIGHT <input type="checkbox"/> QUANTITY D. <input checked="" type="checkbox"/> OTHER (See below)			
13. EXPLANATION (REFER TO ACTION LETTER DESIGNATIONS ABOVE) Merchandise identified as Check Valves or (SLAC Valves) were classified under HTSUS 8481.20.0080 which provides for Valves for oleohydraulic or pneumatic transmissions, other. These check valves or (SLAC Valves) are more properly classified under 8431.30.2090 which provides for Check (nonreturn) valves: of steel. The rate of duty will be 5% ad valorem. This entry will liquidate as proposed unless supporting documentation for an alternative classification is provided by you within 20 business days			
14. CBP OFFICIAL Joan Angelilli	15. TEAM DESIGNATION 307	16. TELEPHONE 847-928-6084	
17. FAX NUMBER	18. EMAIL Joan.Angelilli@Dhs.Gov		

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT A Notice of Liquidation			1. DATE OF THIS NOTICE 03/10/2015
2. CARRIER CNRU	3. DATE OF IMPORTATION	4. DATE OF ENTRY 02/14/2015	5. ENTRY NO. 92300909808
6. MFR/SELLER/SHIPPER GBGOOINTTRE	7. COUNTRY GB	8. CBP BROKER AND FILE NO. PAUL BELLACK INC	
9. DESCRIPTION OF MERCHANDISE Check Valves			
10. TO ▶ GOODWIN INTERNATIONAL LIMITED IVY HOUSE, Leek Road STOKE ON TRENT, ST48HU GB		11. FROM ▶ Joan Angelilli U.S. Customs and Border Protection 5600 Pearl St Rosemont, IL 60018-5318 US	
12. THE FOLLOWING ACTION, WHICH WILL RESULT IN AN INCREASE IN DUTIES, —			
<input type="checkbox"/> IS <u>PROPOSED</u>			
▶ IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASON IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS, THE ENTRY WILL BE EITHER LIQUIDATED AS PROPOSED OR CHANGED AS PROPOSED.			
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13. EXPLANATION (REFER TO ACTION LETTER DESIGNATIONS ABOVE) Merchandise identified as check valves were classified under HTSUS 8481.20.0080/2% which provides for valves for oleohydraulic or pneumatic transmissions, other. These check valves are more properly classified under 8431.30.2090 which provides for check (nonreturn) valves: of steel. The rate of duty will be 5% ad valorem. You will receive a statement for the increase in duty rate plus interest.			
14. CBP OFFICIAL Joan Angelilli		15. TEAM DESIGNATION 307	16. TELEPHONE 847-928-6084
17. FAX NUMBER		18. EMAIL Joan.Angelilli@Dhs.Gov	

NOTICE OF ACTION
Continuation Page

This is NOT A Notice of Liquidation		1. DATE OF THIS NOTICE 03/10/2015	
2. CARRIER CNRU	3. DATE OF IMPORTATION	4. DATE OF ENTRY 02/14/2015	5. ENTRY NO. 92300909808
6. MFR/SELLER/SHIPPER GBGOOINTTRE	7. COUNTRY GB	8. CBP BROKER AND FILE NO. PAUL BELLACK INC	
9. DESCRIPTION OF MERCHANDISE Check Valves			
13. EXPLANATION (REFER TO ACTION LETTER DESIGNATIONS ABOVE)			
92300909808	1	984101-00051	
92300909808	92300909808	984101-00051	
14. CBP OFFICER (PRINT OR TYPE) Joan Andelilli		15. TEAM DESIGNATION 307	16. TELEPHONE NO. 847-928-6084

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/11/2015		
2. CARRIER BREMEN EXPRESS		3. DATE OF IMPORTATION 01/24/2015		4. DATE OF ENTRY 02/08/2015	
5. ENTRY NO. 923 - 00908347		6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL		7. COUNTRY United Kingdom	
8. CBP BROKER AND FILE NO. Paul Bellack		9. DESCRIPTION OF MERCHANDISE Check valves		J90834	
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom			11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252		
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES:- <div style="display: flex; justify-content: space-between;"><div><input type="checkbox"/> IS <u>PROPOSED</u>. <input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u>.</div><div><p>IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED.</p><p>THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.</p></div></div> <div style="display: flex; justify-content: space-between;"><div>TYPE OF ACTION</div><div>A. <input checked="" type="checkbox"/> B. <input type="checkbox"/> C. <input type="checkbox"/> D. <input type="checkbox"/></div><div>RATE ADVANCE VALUE ADVANCE EXCESS <input type="checkbox"/> WEIGHT <input type="checkbox"/> QUANTITY OTHER (See below)</div></div>					
13. EXPLANATION (Refer to Action letter designations above) Check valves were classified under 8481.20.0080, which provides for other valves for pneumatic transmissions. This merchandise will be liquidated under 8481.30.2090, which provides for taps, cocks, valves and similar appliances, for pipes, boiler shells, tanks, vats or the like, including pressure-reducing valves and thermostatically controlled valves; parts thereof: check (nonreturn) valves: of iron or steel...of steel. The rate of duty will be 5 percent ad valorem. Please note that a statement indicating additional duties plus interest due will be sent.					
14. CBP OFFICER (Print or Type) Jeffrey Kiekenbush, Sr. Import Specialist			15. TEAM DESIGNATION CT 307		16. TELEPHONE (847) 928-6085

CBP FORM 29 (03/95)

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION
19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/11/2015
2. CARRIER HOUSTON EXPRESS	3. DATE OF IMPORTATION 10/24/2014	4. DATE OF ENTRY 11/13/2014	5. ENTRY NO. 923 - 00894661
6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL	7. COUNTRY United Kingdom	8. CBP BROKER AND FILE NO. Paul Bellack J89466	
9. DESCRIPTION OF MERCHANDISE Check valves			
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom		11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252	
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,--			
<input type="checkbox"/> IS <u>PROPOSED</u> . <input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u> .		IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED. THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.	
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DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/11/2015
2. CARRIER	3. DATE OF IMPORTATION 02/02/2015	4. DATE OF ENTRY 02/14/2015	5. ENTRY NO. 923 - 00909790
6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL	7. COUNTRY United Kingdom	8. CBP BROKER AND FILE NO. Paul Bellack J90979	
9. DESCRIPTION OF MERCHANDISE Check valves			
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom		11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252	
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,-			
<input type="checkbox"/> IS <u>PROPOSED</u> . IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED.			
<input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u> . THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.			
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14. CBP OFFICER (Print or Type) Jeffrey Kiekenbush, Sr. Import Specialist		15. TEAM DESIGNATION CT 307	16. TELEPHONE (847) 928-6085

CBP FORM 29 (03/95)

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/11/2015	
2. CARRIER HOUSTON EXPRESS		3. DATE OF IMPORTATION 09/30/2014		4. DATE OF ENTRY 10/15/2014
6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL		7. COUNTRY United Kingdom		5. ENTRY NO. 923 - 00893630
8. DESCRIPTION OF MERCHANDISE Check valves		8. CBP BROKER AND FILE NO. Paul Bellack J89363		
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom			11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252	
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,-				
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<input checked="" type="checkbox"/> HAS BEEN TAKEN. THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.				
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			16. TELEPHONE (847) 928-6085	

CBP FORM 29 (03/95)

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/11/2015	
2. CARRIER	3. DATE OF IMPORTATION 02/02/2015	4. DATE OF ENTRY 02/14/2015	5. ENTRY NO. 923 - 00909782	
6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL	7. COUNTRY United Kingdom	8. CBP BROKER AND FILE NO. Paul Bellack J90978		
9. DESCRIPTION OF MERCHANDISE Check valves				
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom		11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252		
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,--				
<input type="checkbox"/> IS <u>PROPOSED</u> . IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED.				
<input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u> . THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.				
TYPE OF ACTION A. <input checked="" type="checkbox"/> RATE ADVANCE B. <input type="checkbox"/> VALUE ADVANCE C. <input type="checkbox"/> EXCESS <input type="checkbox"/> WEIGHT <input type="checkbox"/> QUANTITY D. <input type="checkbox"/> OTHER (See below)				
13. EXPLANATION (Refer to Action letter designations above)				
<p>Check valves were classified under 8481.20.0080, which provides for other valves for pneumatic transmissions. This merchandise will be liquidated under 8481.30.2090, which provides for taps, cocks, valves and similar appliances, for pipes, boiler shells, tanks, vats or the like, including pressure-reducing valves and thermostatically controlled valves; parts thereof: check (nonreturn) valves: of iron or steel...of steel. The rate of duty will be 5 percent ad valorem.</p> <p>Please note that a statement indicating additional duties plus interest due will be sent.</p>				
14. CBP OFFICER (Print or Type) Jeffrey Kiekenbush, Sr. Import Specialist		15. TEAM DESIGNATION CT 307		16. TELEPHONE (847) 928-6085

CBP FORM 29 (03/95)

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION
19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/12/2015	
2. CARRIER KUALA LUMPUR EXPRESS		3. DATE OF IMPORTATION 07/25/2014		4. DATE OF ENTRY 08/03/2014
5. ENTRY NO. 923 - 00882609		6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL		
7. COUNTRY United Kingdom		8. CBP BROKER AND FILE NO. Paul Bellack J88260		
9. DESCRIPTION OF MERCHANDISE Check valves				
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom			11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252	
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,--				
<input type="checkbox"/> IS <u>PROPOSED</u> . IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED.				
<input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u> . THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.				
TYPE OF ACTION A. <input checked="" type="checkbox"/> RATE ADVANCE B. <input type="checkbox"/> VALUE ADVANCE C. <input type="checkbox"/> EXCESS <input type="checkbox"/> WEIGHT <input type="checkbox"/> QUANTITY D. <input type="checkbox"/> OTHER (See below)				
13. EXPLANATION (Refer to Action letter designations above).				
<p>Check valves were classified under 8481.20.0080, which provides for other valves for pneumatic transmissions. This merchandise will be liquidated under 8481.30.2090, which provides for taps, cocks, valves and similar appliances, for pipes, boiler shells, tanks, vats or the like, including pressure-reducing valves and thermostatically controlled valves; parts thereof: check (nonreturn) valves: of iron or steel...of steel. The rate of duty will be 5 percent ad valorem.</p> <p>Please note that a statement indicating additional duties plus interest due will be sent.</p>				
14. CBP OFFICER (Print or Type) Jeffrey Kiekenbush, Sr. Import Specialist			15. TEAM DESIGNATION CT 307	
			16. TELEPHONE (847) 928-6085	

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/12/2015	
2. CARRIER APL SHANGHAI	3. DATE OF IMPORTATION 04/29/2014	4. DATE OF ENTRY 05/06/2014	5. ENTRY NO. 923 - 00876023	
6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL	7. COUNTRY United Kingdom	8. CBP BROKER AND FILE NO. Paul Bellack J87602		
9. DESCRIPTION OF MERCHANDISE Check valves				
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom		11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252		
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,--				
<input type="checkbox"/> IS <u>PROPOSED</u> . <input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u> .		IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED. THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.		
TYPE OF ACTION A. <input checked="" type="checkbox"/> B. <input type="checkbox"/> C. <input type="checkbox"/> D. <input type="checkbox"/>		RATE ADVANCE VALUE ADVANCE EXCESS <input type="checkbox"/> WEIGHT <input type="checkbox"/> QUANTITY OTHER (See below)		
13. EXPLANATION (Refer to Action letter designations above)				
<p>Check valves were classified under 8481.20.0080, which provides for other valves for pneumatic transmissions. This merchandise will be liquidated under 8481.30.2090, which provides for taps, cocks, valves and similar appliances, for pipes, boiler shells, tanks, vats or the like, including pressure-reducing valves and thermostatically controlled valves; parts thereof: check (nonreturn) valves: of iron or steel...of steel. The rate of duty will be 5 percent ad valorem.</p> <p>Please note that a statement indicating additional duties plus interest due will be sent.</p>				
14. CBP OFFICER (Print or Type) Jeffrey Kiekenbush, Sr. Import Specialist		15. TEAM DESIGNATION CT 307		16. TELEPHONE (847) 928-6085

CBP FORM 29 (03/95)

DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

NOTICE OF ACTION

19 CFR 152.2

This is NOT a Notice of Liquidation			1. DATE OF THIS NOTICE 03/16/2015	
2. CARRIER OSAKA EXPRESS		3. DATE OF IMPORTATION 02/03/2015	4. DATE OF ENTRY 02/25/2015	5. ENTRY NO. 923 -- 00909246
6. MFR/SELLER/SHIPPER GOODWIN INTERNATIONAL		7. COUNTRY United Kingdom	8. CBP BROKER AND FILE NO. Paul Bellack J90924	
9. DESCRIPTION OF MERCHANDISE Check valves				
10. TO GOODWIN INTERNATIONAL LIMITED IVY HOUSE, LEEK ROAD STOKE ON TRENT, ST48HU United Kingdom			11. FROM U.S. Customs and Border Protection 5600 Pearl Street Rosemont, IL 60018 Fax: 847-928-8252	
12. THE FOLLOWING ACTION WHICH WILL RESULT IN AN INCREASE IN DUTIES,—				
<input type="checkbox"/> IS <u>PROPOSED</u> . IF YOU DISAGREE WITH THIS PROPOSED ACTION, PLEASE FURNISH YOUR REASONS IN WRITING TO THIS OFFICE WITHIN 20 DAYS FROM THE DATE OF THIS NOTICE. AFTER 20 DAYS THE ENTRY WILL BE LIQUIDATED AS PROPOSED.				
<input checked="" type="checkbox"/> HAS BEEN <u>TAKEN</u> . THE ENTRY IS IN THE LIQUIDATION PROCESS AND IS NOT AVAILABLE FOR REVIEW IN THIS OFFICE.				
TYPE OF ACTION A. <input checked="" type="checkbox"/> RATE ADVANCE B. <input type="checkbox"/> VALUE ADVANCE C. <input type="checkbox"/> EXCESS <input type="checkbox"/> WEIGHT <input type="checkbox"/> QUANTITY D. <input type="checkbox"/> OTHER (See below)				
13. EXPLANATION (Refer to Action letter designations above)				
<p>Check valves were classified under 8481.20.0080, which provides for other valves for pneumatic transmissions. This merchandise will be liquidated under 8481.30.2090, which provides for taps, cocks, valves and similar appliances, for pipes, boiler shells, tanks, vats or the like, including pressure-reducing valves and thermostatically controlled valves; parts thereof: check (nonreturn) valves: of iron or steel...of steel. The rate of duty will be 5 percent ad valorem.</p> <p>Please note that a statement indicating additional duties plus interest due will be sent.</p>				
14. CBP OFFICER (Print or Type) Jeffrey Kiekenbush, Sr. Import Specialist			15. TEAM DESIGNATION CT 307	16. TELEPHONE (847) 928-6085

CBP FORM 29 (03/95)

ATTACHMENT B



COPY NON NEGOTIABLE

SEA WAYBILL

SHIPPER/EXPORTER TRINITY LINE AS AGENTS GOODWIN INTERNATIONAL LTD NEWSTEAD TRADING EST TRENTHAM ST4 8HU		BOOKING NO. 5581847560 EXPORT REFERENCES (for the merchant's and/or carrier's reference only) BE14070182 SC0400836, SC0400836V06, 053 - NE - USA (WB) EUROPE TO USA/CANADA	SEA WAYBILL NO. NYKS5581847560
CONSIGNEE PONTIAC WAREHOUSE ENBRIDGE ENERGY 1002 W. NORTH STREET PONTIAC IL 61764-1001 USA JOHN LEGROS AT 815 419 4127 JERRY PHILLIPS AT 309 573 1242		FORWARDING AGENT-REFERENCES FMC NO.	
NOTIFY PARTY (It is agreed that no responsibility shall be attached to the Carrier or its Agents for failure to notify) AIR SEA INTERNATIONAL FORWARDING INC, 1320 WWEST BLANCKE STREET, LINDEN, NEW JERSEY 07036 USA DIRECT TEL 732 547 0489 OFFICE TEL 908 583 5086		RECEIVED by the Carrier from the Shipper in apparent good order and condition unless otherwise indicated herein. The Goods, or package(s) said to contain the Goods, to be carried subject to all the terms and conditions herein. Delivery of the Goods to the Carrier for Carriage hereunder constitutes the Merchant's acceptance of all the stipulations, exceptions, terms and conditions of this Bill as fully as if signed by him, any contrary local custom or privilege notwithstanding. This Bill supercedes all prior agreements or freight engagements for the Goods. If required by the Carrier, this Bill (duly endorsed if it is negotiable) must be surrendered in exchange for the Goods or delivery order. Where issued as a Sea Waybill, this Bill is not negotiable and a document of title and delivery shall be made to the named consignee on production of such reasonable proof of identity as may be required by the Carrier. In witness whereof, the undersigned, on behalf of Nippon Yusen Kaisha and the Vessel and/or her owner, has signed the number of Bills stated hereunder, all of this tenor and date. Where issued as a Bill of Lading, delivery may be made against only one original Bill in which case, the others shall stand void	
PRE-CARRIAGE BY	PLACE OF RECEIPT STOKE ON TRENT	FINAL DESTINATION (for the Merchant's reference only)	
OCEAN VESSEL VOYAGE NO. FLAG KUALA LUMPUR EXPRESS 038W	PORT OF LOADING SOUTHAMPTON	TYPE OF MOVEMENT (IF MIXED, USE DESCRIPTION OF PACKAGES AND GOODS FIELD) FCL / FCL DOOR / DOOR	
PORT OF DISCHARGE NORFOLK	PLACE OF DELIVERY PONTIAC, IL 61764		

(CHECK "IM" COLUMN IF HAZARDOUS MATERIAL)		PARTICULARS DECLARED BY SHIPPER BUT NOT ACKNOWLEDGED BY THE CARRIER			
CNTR. NOS. W/SEAL NOS. MARKS & NUMBERS	QUANTITY (FOR CUSTOMS DECLARATION ONLY)	H M	DESCRIPTION OF GOODS	GROSS WEIGHT	GROSS MEASUREMENT
TTNU5546749 / EUR355255	/		8 WOODEN CASES / FCL / FCL	/40GP/18084	000 KG/
P.O. P91282-04183 -13	8 WOODEN CASES		CHECK VALVES CASE 1 GROSS 2127 KGS NET 1997 KGS DIMS 146X144X84 CMS CASE 2 GROSS 2127 KGS NET 1997 KGS DIMS 146X144X84 CMS CASE 3 GROSS 2127 KGS NET 1997 KGS DIMS 146X144X84 CMS CASE 4 GROSS 2127 KGS NET 1997 KGS DIMS 146X144X84 CMS CASE 5 GROSS 2394 KGS NET 2270 KGS DIMS 113X111X132CMS	18084.000KGS	
** TO BE CONTINUED ON ATTACHED LIST **					

Declared Cargo Value US\$

If Merchant enters a value, Carrier's limitation of liability shall not apply and the ad valorem rate will be charged.

FREIGHT & CHARGES PAYABLE AT / BY:		SERVICE CONTRACT NO. SC0400836	DOC FORM NO.	COMMODITY CODE	EXCHANGE RATE	[O] ORIGINAL BILL(S) HAVE BEEN SIGNED. DATE CARGO RECEIVED 12 JUL 2014 DATE LADEN ON BOARD 17 JUL 2014 PLACE OF BILL(S) ISSUE LIVERPOOL DATED 17 JUL 2014
CODE	TARIFF ITEM	FREIGHTED AS	RATE	PREPAID	COLLECT	
SIGNED NYK GROUP EUROPE LTD. BY: _____, as agent for and on behalf of						

NIPPON YUSEN KAISHA
(NYK LINE), AS CARRIER

PAGE: 2 OF 2

B/L NO.: NYKS5581847560

SIGNED NYK GROUP EUROPE LTD.
BY:

, as agent for and on behalf of

NIPPON YUSEN KAISHA
(NYK LINE), AS CARRIER

ATTACHMENT C

**CONFIDENTIAL MATERIAL IS
EXCLUDED**

ATTACHMENT D

**CONFIDENTIAL MATERIAL IS
EXCLUDED**

ATTACHMENT E

PAUL BELLACK INC

WWW.PAULBELLACK.COM

FMC LIC# 1546, CHB# 7956

149 BLACK HORSE LANE

NORTH BRUNSWICK, NJ 08902

Phone: 732-422-1784 Fax: 732-422-1713

INVOICE**SERVICES BILLED TO:****AIR SEA INTERNATIONAL FORWARDING****PO BOX 340****ADELPHIA, NJ 07710**

ACCT NO. AIRSEJ	INVOICE NO. 01-J88260
INVOICE DATE 07/24/2014	FILE NO. J88260
DUE DATE 07/24/2014	YOUR REFERENCE NO.
TERMS DUE UPON RECEIPT	

AIRLINE/STEAMSHIP KUALA LUMPUR EXPRESS 038E	MASTER NYKS 5581847560	HOUSE
---	----------------------------------	-------

ARRIVAL DATE 07/27/2014	DEPARTURE DATE 07/16/2014	SHIPPER/CONSIGNEE GOODWIN INTERNATIONAL LIMITED	ORIGIN/DESTINATION FELIXSTOWE, ENGLAND CHICAGO, IL
PIECES 8	WEIGHT 18,084 KGS		

DATE OF ENTRY 07/27/2014	ENTRY # 923-0088260-9	DESCRIPTION INDUSTRIAL VALVES
------------------------------------	---------------------------------	---

U.S. CUSTOMS DUTIES	10,855.51	THE IMPORTER MUST FURNISH MISSING DOCUMENTS WITHIN THE PERIOD OF TIME REQUIRED BY CUSTOMS REGULATIONS TO AVOID CUSTOM PENALTIES
CUSTOMS ENTRY FEE	85.00	
ISF FILING FEE	25.00	
SUBTOTAL	10,965.51	
INTEREST	0.00	
LESS DEPOSIT, LESS ADVANCE	0.00	
PLEASE PAY THIS AMOUNT	10,965.51	

REMARKS PLEASE REMIT PAYMENT TO OUR MAIN OFFICE LOCATED AT: 149 BLACK HORSE LANE NORTH BRUNSWICK, NJ 08902	YOUR BUSINESS IS TRULY APPRECIATED! WE ARE A PROUD MEMBER OF C-TPAT
---	--

If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to "U.S. Customs and Border Protection" which shall be delivered to Customs by the broker.

ORIGINAL INVOICE

ATTACHMENT F

A.S.I. FORWARDING, INC.

1320 WEST BLANCKE STREET, LINDEN, NJ 07036 UNITED STATES Tel: 908-583-5086 Fax: 908-583-5083

Invoice

Date	Due Date	Number
Jul/24/2014	Jul/24/2014	29787

Bill to FIELDING INTERNATIONAL FREIGHT NO 19 MOORSLAND URMSTEN, MANCHESTER UNITED KINGDOM	Shipper: GOODWIN INTL Consignee: ENBRIDGE ENERGY LTD Origin/Destination: SOUTH/ Destination: / ORF Entry Date: Jul/24/2014 Carrier: NYK LINES AWB / BL No.: NYKS5581847560 House Way Bill: Pieces / Weight: 1 / 39868.40 lb Booking Number: 29787 Desc. of Goods: CHECK VALVES Final Destination: Pontiac Livingston IL
--	--

Description of Charges	Quantity	Price	Amount
EST. DUTY AND TAXES	1.00	24401.20	24401.20
MPF	1.00	1773.48	1773.48
HMF	1.00	610.03	610.03
COURIER	1.00	45.00	45.00

REMIT PAYMENT TO:

By Check:
ASI Forwarding Inc.
PO Box 340
Adelphia, NJ 07710

By Wire:
ASI Forwarding Inc.
c/o TD Bank NA
Route 9 South
Old Bridge, NJ 08857
Routing # 031201360
Swift # NRTHUS33
Account # 7866307395

Interest of 3.5% plus the cost of
collection, as well as legal fees
will be charged to your account
for any past due amounts or non

USD Amount	268297.10000
Tax	0.00
Total	268297.1

ATTACHMENT G

**CONFIDENTIAL MATERIAL IS
EXCLUDED**

RECEIVED

2015 AUG 27 PM 1:11

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

) DOCKET NO. 15-07

V.

 ORIGINAL

Respondents

A circular black and white stamp. The word "SERVED" is arched across the top. The date "SEP 3 2015" is in the center. The words "FEDERAL MARITIME COMMISSION" are arched across the bottom.

By:

By: Carl Rodriguez

Husch Blackwell LLP

750 17th Street NW, Suite 900
Washington DC 20006
Carlos.rodriguez@huschblackwell.com
Zheng.xie@huschblackwell.com
202-378-2365 (Telephone)
202-378-2319 (Facsimile)
Attorneys for Complainant

Dated in Washington, D.C., this twenty-sixth day of August 2015.